



Order Filed on March 5, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Robertson, Anschutz, Schneid & Crane LLC**

Attorneys for Secured Creditor  
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Duluth, GA 30097  
Telephone No.: 973-575-0707 (local)  
Telephone No.: 561-241-6901 (main)

Harold Kaplan (HK0226)

In Re:

**Kristine Rhodes,**

**Debtor,**

Case No.: 16-23820-ABA

Chapter: 13


Hearing Date: March 3, 2020

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

**DATED: March 5, 2020**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

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Secured Creditor: JPMORGAN CHASE BANK, N.A.

Secured Creditor's Counsel: Robertson, Anschutz, Schneid & Crane LLC

Debtors' Counsel: Andrew Thomas Archer, Esq.

Property Involved ("Collateral"): 2013 Ford Explorer VIN#1FM5K8D84DGA82161

Relief sought:

- Motion for relief from the automatic stay
- Motion to dismiss
- Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 7 months from August 28, 2019 through February 28, 2020.
- The Debtor is overdue for 1 payment from August 28, 2019 at \$358.11 per month.
- The Debtor is overdue for 6 payments from September 28, 2019 at \$589.20 per month.

Funds Held In Suspense \$0.00.

Total Arrearages Due \$3,893.31.

2. Debtor must cure all post-petition arrearages, as follows:

- Beginning on March 28, 2020 regular monthly payments shall continue to be made in the amount of \$589.20.
- Immediate lump sum payment shall be made in the amount of \$3,302.80 upon entry of this Order.
- Immediate payment shall be made in the amount of \$590.51. Payment shall be made within 10 days of entry of this Order.

3. Payments to the Secured Creditor shall be made to the following address(es):

■ Regular monthly payment: Chase Auto  
ATTN: Bankruptcy Dept  
P.O. Box 901032  
Fort Worth, TX 76101

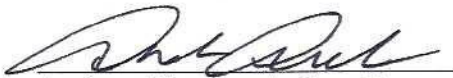
■ Monthly cure payment: Chase Auto  
ATTN: Bankruptcy Dept  
P.O. Box 901032  
Fort Worth, TX 76101


4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

The undersigned hereby consent to the form and entry of the foregoing order.

  
Andrew Thomas Archer, Esq.  
Attorney for Debtor(s)  
Date: 3/4/2020

/s/ Harold Kaplan  
  
Harold Kaplan, Esq.  
Attorney for Secured Creditor  
Date: 3/5/2020